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Via ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York

MEMO ENDORSED

Re: *Todd Kreisler v. 434 Broadway Property Investors III, LLC and Hanesbrand Inc.*

Docket No. 1:19-cv-08583 (VEC)(DCF)

Dear Judge Caproni:

We represent the plaintiff in the above-entitled action. Because of the coronavirus pandemic (COVID-19) and the significant affect that it is having on the parties, we write to respectfully ask the Court to stay all discovery deadlines and conferences sine die with the parties providing a status update on May 29, 2020 regarding whether discovery can be resumed. Thank you for your time and attention to this matter. With kindest regards, I am very truly yours,

/s/

Glen H. Parker, Esq.

Fact discovery is extended through **June 26, 2020**. The parties are advised that, given the lengthy extension, the Court expects the parties to be able to complete all fact discovery by that date, notwithstanding the general challenges posed by COVID-19. If the parties cannot complete fact discovery by June 26, they must explain, promptly and with greater specificity, why they could not do so despite their best efforts.

The April 24 status conference is adjourned to **June 26, 2020, at 10:00 A.M.** A joint pre-conference letter is due by **June 18, 2020**. Deadlines for expert discovery will be set at the next conference.

SO ORDERED.

Date: 03/31/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE